

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554

In the Matter of)
)
Changes in Part 97) **RM - 10868**
With Regard to Amateur Radio)
Service Streamlining)

To: The Commission

I would like to thank the Commission for the opportunity to comment on RM-10868. I am Amateur Radio Operator KC0ARF who was licensed in 1997, and I am a Technician Class operator. I am particularly active in Skywarn weather collection activities, along with Amateur Radio social activities.

I am **not** in favor of this petition. Please consider my objections:

World Radio Conference (WRC-03)

1. The WRC-03 session removed the international requirement for Morse Code (CW) on all Amateur Radio Stations. They amended Article 25 as follows below:

Administrations shall determine whether or not a person seeking a license to operate an amateur station shall demonstrate the ability to send and receive texts in Morse Code signals.

As of this writing, several countries have already relaxed Morse Code requirements, particularly in Europe and the Pacific islands. I believe that it is time for the United States to follow suit. Morse Code is merely a communications method; it is not a test of intelligence, nor does it bring technical skill to the Amateur Radio Service. Relaxation of Morse Code requirements are not supported under RM-10868.

Restructure of America's Amateur Radio Service

2. I agree with the Radio Amateur Foundation that the Amateur Radio Service (ARS) needs to be re-structured. The FCC presently has 6 ARS license types: Novice, Technician, Technician Plus, General, Advanced, and Amateur Extra. Since 2000, the Commission closed new applicants from the Novice and Advanced classes, but kept them in existence without modifying their frequency privileges.

3. I assert that any restructuring plan should not result with a loss of privileges to any one class. For example, Technicians should not lose spectrum after re-structure, as they may have assets such as repeaters in place, and it would be wrong to remove them.

4. I disagree with the Radio Amateur Foundation that the Technician class is a proper entry class license. I personally entered the Amateur Radio Service as a Technician, and found that our license class has tremendous privileges above 50 MHz, along with a lot of *responsibility* for operations. Today's Technician may explore all ARS opportunities above 50 MHz, with full legal power. They may build radio-based computer networks, may operate repeaters, may install and configure elaborate remote receive sites on repeaters, and may send Amateur Television (ATV). With so many choices, the new operator has to "be careful" and work with others to properly learn the "ropes" of amateur radio. It should be rather clear to the Commission that Technicians have developed these talents without the gift of Morse Code.

5. Along my reasoning, I think it is far more logical to promote today's Technician to the General Class, and create a new Novice class to properly introduce a new operator to the hobby. Similar to a Probationary License to learn how to drive a car, I think a Novice / Communicator license is much more appropriate introduction to the Amateur Radio Service, and feel that we are much better off with RM-10867 or RM-10870.

Myth of Morse Code

6. The bulk of the Radio Amateur Foundation's RM-10868 discusses why Morse Code (CW) must be preserved as a license requirement for the Amateur Radio Service (ARS). They admit in paragraph 14, for example, that other services are "pulling the plug" on CW, and even admit that Maritime and commercial entities are "mostly concerned with being able to move massive amounts of information reliably, and in a short period of time." Wouldn't an ARS station desire a similar approach to an emergency situation? There are several computer standards such as PACTOR, PSK31, and others, with error correction, that could move information faster than a CW conversation. I also disagree with paragraph 15, where RM-10868 states that "moving to other modes of communication are primarily motivated and necessitated by optimizing those commercial interests and nothing else". I open the possibility that other services may change modes to be more efficient and capable, and not limiting the organization to an older, slower method.

7. I disagree with Paragraph 18's assertion that the "best and the brightest will have little trouble mastering CW in short order... only if they are so motivated." Again, the Radio Amateur Foundation asserts that CW will provide for a "super communicator" who is able to surmount all communications challenges. If one stops to think about it, why would the "best and brightest" study something they know that they have no desire using? I personally choose not to study Morse Code because I have enough other things going on in life that I cannot justify the time and energy on this hobby pursuit. Does it make sense that gifted, talented people who can organize communication operations be banned because they do not understand CW? I wonder if the goal of paragraph 18 is to further classify and

segment the ARS population. I would further argue that the last particular comments sound rather elitist and boastful, a good sign of a close-minded group seeking to protect their assets and remain pure.

8. I disagree with paragraphs 23 and 24 that CW will magically survive the nuclear attack against the United States. While the effects of wide-spread thermonuclear exchange are unknown, I would be willing to bet that anyone with radio equipment would be welcome to assist. I would further assert that the more people trained on how to install antennas and work without high-power commercial gear would be a greater asset than a trained telegraph operator. I am curious on why the Radio Amateur Foundation didn't expand on their myth that "CW will save the day" and require *regular testing* of operators to ensure that code is complete. It would also follow suit that operators might have to build their own equipment if a disaster like this occurred, yet no provisions are suggested within the proposal to complete their argument.

Conclusions

9. I disagree with many of the assertions made by RM-10868, and request that the Commission deny their request. The Radio Amateur Foundation's proposal seeks to preserve at all costs the art of Morse Code, yet uses weak arguments to convince the average Amateur Radio Service citizen on why they should learn the mode. The argument that an operator who knows CW is much more brilliant and capable of a person is false.

Thank you for your consideration.

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